

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Roberta Alford	<u>Debtor</u>	CHAPTER 13
Lakeview Loan Servicing, LLC	<u>Movant</u>	
vs.		NO. 18-11789 ELF
Roberta Alford	<u>Debtor</u>	
William C. Miller Esq.	<u>Trustee</u>	11 U.S.C. Section 362

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. The post-petition arrearage on the mortgage held by the Movant on the Debtor's residence is **\$11,128.70**, which breaks down as follows;

Post-Petition Payments: April 2018 to August 2018 at \$2,019.54/month
Fees & Costs Relating to Motion: \$1,031.00
Total Post-Petition Arrears \$11,128.70

2. The Debtor shall make a lump sum payment in the amount of **\$11,128.70** by **September 15, 2018**.

3. Beginning with the payment due October 1, 2018 and continuing through September 1, 2019, Debtor shall pay to Movant the present regular monthly mortgage payment of \$2,019.54 (or as adjusted pursuant to the terms of the mortgage) on or before the first (1st) day of each month (with late charges being assessed after the 15th of the month), plus an installment payment of **\$168.30 from October 2018 to August 2019 and \$168.24 for September 2019** to the following address:

Cenlar FSB
425 Phillips Blvd
Ewing, NJ 08618

4. Should debtor(s) provide sufficient proof of payments (front & back copies of cancelled checks and/or money orders) made, but not credited, Movant shall adjust the account accordingly.


5. In the event the payments under Section 2 above are not tendered pursuant to the terms of this stipulation, the Movant shall notify Debtor(s) and Debtor's attorney of the default in writing and the Debtors may cure said default within FIFTEEN (15) days of the date of said notice. If Debtor(s) should fail to cure the default within fifteen (15) days, the Movant may file a Certification of Default with the Court and the Court shall enter an Order granting the Movant relief from the automatic stay.
6. The stay provided by Bankruptcy Rule 4001(a)(3) is waived.
7. If the case is converted to Chapter 7, the Movant shall file a Certification of Default with the court and the court shall enter an order granting the Movant relief from the automatic stay.
8. If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall be null and void, and is not binding upon the parties.
9. The provisions of this stipulation do not constitute a waiver by the Movant of its right to seek reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms of the mortgage and applicable law.
10. The parties agree that a facsimile signature shall be considered an original signature.


Date: August 23, 2018

Date: _____

Date: 8/27/18

By: /s/ Rebecca A. Solarz, Esquire
Rebecca A. Solarz, Esquire


Erik B. Jensen, Esquire
Attorney for Debtor


William C. Miller, Esquire
Chapter 13 Trustee

NO OBJECTION
*without prejudice to any
trustee rights or remedies.

Approved by the Court this _____ day of _____, 2018. However, the court retains discretion regarding entry of any further order.

Bankruptcy Judge
Eric L. Frank